

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

No. 13-cv-8130 (RA) (JLC)

WILLIAM HAAS AND AKHLAQUR RAHMAN on  
behalf of themselves and all others similarly situated,

Plaintiffs,

-against-

VERIZON NEW YORK, INC.

Defendant.

**NOTICE OF PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION  
AND NOTICE PURSUANT TO 29 U.S.C. § 216(b)**

PLEASE TAKE NOTICE THAT Plaintiffs William Haas and Akhlaqur Rahman will move this Court, before the Honorable Ronnie Abrams, on a date and time to be determined by the Court, pursuant to 29 U.S.C. § 216(b), for an Order granting Plaintiffs' Motion for Conditional Certification and Notice. A memorandum of law and the Declaration of Kelly A. Magnuson, together with Exhibits, supports this motion and are filed contemporaneously herewith.

In accordance with the Court's Scheduling Order, Defendant Verizon New York, Inc. must serve any opposition papers on or before December 8, 2014, and Plaintiffs must serve any reply papers on or before December 22, 2014.

Dated: Great Neck, New York  
November 17, 2014

Respectfully submitted,

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